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12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,  
15 Plaintiff,  
16 v.  
17 PAUL ALEXANDER HODGE,  
18 Defendant.

Case No. 2:21-CR-00200-RFB-VCF

**Stipulation To Continue Supervised  
Release Revocation Hearing  
(Third Request)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.  
20 Frierson, United States Attorney, and Kimberly M. Frayn, Assistant United States  
21 Attorney, counsel for the United States of America, and Rene L. Valladares, Federal  
22 Public Defendant and Benjamin F. Nemec, Assistant Federal Public Defender, counsel  
23 for Paul Alexander Hodge, ("Hodge"), that the supervised release revocation hearing in  
24 the abovementioned case, which is currently scheduled for February 4, 2025, be  
25 continued and reset to a date and time convenient to this Court, but not sooner than 90  
26 days from the current hearing date for the following reasons:

1. On or about December 14, 2023, Hodge appeared on a criminal Complaint  
alleging that he committed Covid-19 Relief Funds Bank Fraud, a violation of 18 U.S.C. §

1 1344(2), and was released on conditions pending a preliminary hearing, which is  
2 presently scheduled for March 24, 2025.

3 2. On or about December 13, 2023, a petition seeking to revoke Hodge's  
4 supervised release was filed. At the June 11, 2024 initial appearance, Hodge was released  
5 on bond pending a revocation hearing in this case, which is currently set for February 4,  
6 2025 before this Court.

7 3. The parties have agreed to continue the supervised release revocation  
8 hearing for at least 90 days. The parties have negotiated an agreed global resolution to  
9 include the revocation violations<sup>1</sup> and the fraud matter. The parties need additional time  
10 to reduce the agreement to writing and have the defendant plead guilty pursuant to the  
11 terms of the agreement to a criminal information containing charge in the complaint,  
12 Covid-19 Relief Funds Bank Fraud, in violation of 18 U.S.C. § 1344(2).

13 4. If the defendant does not execute the agreement or if the Court does not  
14 accept his guilty plea, the parties will need additional time to adequately prepare for the  
15 revocation hearing.

16 5. Government counsel is out of the district all next week and requests the  
17 continuance for continuity of counsel.

18 6. The defendant is at liberty and will not be unduly prejudiced by the brief  
19 delay requested herein.

20 7. The parties agree to the continuance.

21 8. The additional time requested herein is not sought for purposes of delay,  
22 but merely to allow the parties government sufficient time within which to adequately  
23 prepare for the revocation hearing and to allow the government continuity of counsel.

24  
25 <sup>1</sup> On or about December 14, 2023, a petition seeking to revoke Hodge's supervised  
26 release was also filed. The revocation hearing in that matter is currently set for February  
18, 2025 in case number 2:21-cr-93-KJD-BNW.

1 Additionally, denial of this request for continuance could result in a miscarriage of  
2 justice, and the ends of justice served by granting this request,  
3 outweigh the best interest of the public and the defendant in a speedy hearing.

4 9. This is the third stipulation to continue the hearing.

5 DATED this 31st day of January, 2025.

6 Respectfully submitted,

7  
8 RENE L. VALLADARES  
9 Federal Public Defender

SUE FAHAMI  
Acting United States Attorney

10 */s/ Benjamin F. Nemec*  
11 By \_\_\_\_\_  
12 Benjamin F. Nemec  
Assistant Federal Public Defender

*/s/ Kimberly M. Frayn*  
By \_\_\_\_\_  
KIMBERLY M. FRAYN  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4  
5 Plaintiff,  
6 v.  
7 PAUL ALEXANDER HODGE,  
8 Defendant.

Case No. 2:21-CR-00200-RFB-VCF

**Findings of Fact, Conclusions of Law  
and Order**

9  
10 **FINDINGS OF FACT**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore,  
12 the Court finds that:

13 1. On or about December 14, 2023, Hodge appeared on a criminal Complaint  
14 alleging that he committed Covid-19 Relief Funds Bank Fraud, a violation of 18 U.S.C. §  
15 1344(2), and was released on conditions pending a preliminary hearing, which is  
16 presently scheduled for March 24, 2025.

17 2. On or about December 13, 2023, a petition seeking to revoke Hodge's  
18 supervised release was filed. At the June 11, 2024 initial appearance, Hodge was released  
19 on bond pending a revocation hearing in this case, which is currently set for February 4,  
20 2025 before this Court.

21 3. The parties have agreed to continue the supervised release revocation  
22 hearing for at least 90 days. The parties have negotiated an agreed global resolution to  
23 include the revocation violations<sup>2</sup> and the fraud matter. The parties need additional time  
24

25 <sup>2</sup> On or about December 14, 2023, a petition seeking to revoke Hodge's supervised  
26 release was also filed. The revocation hearing in that matter is currently set for February  
18, 2025 in case number 2:21-cr-93-KJD-BNW.

1 to reduce the agreement to writing and have the defendant plead guilty pursuant to the  
2 terms of the agreement to a criminal information containing charge in the complaint,  
3 Covid-19 Relief Funds Bank Fraud, in violation of 18 U.S.C. § 1344(2).

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5 accept his guilty plea, the parties will need additional time to adequately prepare for the  
6 revocation hearing.

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8 continuance for continuity of counsel.

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10 delay requested herein.

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12 8. The additional time requested herein is not sought for purposes of delay,  
13 but merely to allow the parties government sufficient time within which to adequately  
14 prepare for the revocation hearing and to allow the government continuity of counsel.  
15 Additionally, denial of this request for continuance could result in a miscarriage of  
16 justice, and the ends of justice served by granting this request,  
17 outweigh the best interest of the public and the defendant in a speedy hearing.

18 9. This is the third stipulation to continue the hearing.

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**ORDER**

THEREFORE, IT IS HEREBY ORDERED that the revocation hearing in the above-captioned matters, currently scheduled for February 4, 2025, be vacated and continued to a May 27, 2025 at 8:30 a.m.

DATED February 3, 2025.



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HONORABLE RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT COURT JUDGE